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March 18, 2022

Via ECF

Hon. Barbara Moses
United States District Court
Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street, Room 740
New York, NY 10007

Re: Fashion Leaf Garment Co. Ltd. et al. v. Ringerjeans LLC et al.
Civil Action No. 1:19-CV-03381-AC
Request for Discovery Moratorium

Dear Magistrate Moses:

I must regretfully advise the Court of the death earlier this month of our colleague, Bernard Fishman, counsel for the original plaintiffs, Fashion Leaf Garment Co. Ltd. and Alex Zhao. I have been advised that Fashion Leaf and Mr. Zhao are in the process of selecting new counsel.

In the meantime, counsel for intervenor plaintiff, Anhui Garments Import & Export Co., Ltd. and I, on behalf of the Defendants, respectfully jointly request that the Court impose a moratorium on discovery and all case deadlines for sixty days while replacement counsel is retained and brought up to speed on the litigation. Once new counsel has contacted us, we will collectively advise the Court to schedule a status conference so that a revised discovery plan may be implemented.

Respectfully yours,

/s/ J. Ted Donovan

cc: Charles Wizenfeld, Esq. (via ECF and email)

MEMO ENDORSED

USDC SDNY
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Application GRANTED. The Court extends its condolences to the family of attorney Fishman. The fact discovery deadline is extended to **June 15, 2022**. The summary judgment deadline is extended to **August 1, 2022**. Judge Moses will conduct a status conference on **June 27, 2022, at 11:00 a.m.**, in Courtroom 20A, 500 Pearl Street, New York, New York. No later than **June 21, 2022**, the parties shall submit a joint status letter outlining the progress of discovery efforts to date.

Barbara Moses, USMJ, 3/21/2022